

EXHIBIT C

**Declaration of Raina Borelli in Support of Plaintiffs’
Motion for Class Certification**

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**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ANTHONY SESSA AND MARK SESSA,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ANCESTRY.COM OPERATIONS INC., a
Virginia Corporation; ANCESTRY.COM,
INC., a Delaware Corporation;
ANCESTRY.COM LLC, a Delaware Limited
Liability Company,

Defendants.

Case No.: 2:20-cv-02292-GMN-BNW

**DECLARATION OF RAINA C.
BORRELLI IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Hon. Gloria M. Navarro

I, Raina C. Borrelli, declare:

1. I am a partner of Turke & Strauss LLP, one of the counsel of record for Plaintiffs, where I manage the firm's class action litigation practice. I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. I am admitted to practice before this Court *pro hac vice*. I submit this declaration in support of Plaintiffs' motion for class certification and appointment of class counsel.

3. Turke & Strauss is a law firm based in Madison, Wisconsin that focuses on

1 complex civil and commercial litigation with an emphasis on consumer protection, employment,
2 wage and hour, business, real estate, and debtor-creditor matters. Turke & Strauss has extensive
3 experience in the prosecution of class actions on behalf of consumers and has been appointed as
4 class counsel in numerous matters., including the following:

- 5 a. *Jones, et al. v. Monsanto Company*, filed on behalf of individuals who
6 purchased mislabeled RoundUp® products. The case settled on a class-wide
7 basis in 2020 for \$39,550,000.00 and final approval is pending in the United
8 States District Court for the Western District of Missouri.
- 9 b. *Murray, et al. v. Grocery Delivery E-Services USA Inc. d/b/a Hello Fresh* (D.
10 Mass.), a TCPA class settlement of \$14,000,000 was granted final approval in
11 October 2021 and is currently on appeal to the United States Court of Appeals
12 for the First Circuit.
- 13 c. *Baldwin, et al. v. Miracle-Ear, Inc., et al.* (D. Minn.), a TCPA class settlement
14 of \$8,000,000 is currently pending preliminary approval before the district
15 court.
- 16 d. *Evans v. American Power & Gas, LLC*, et al., 2:17-cv-00515 (S.D. Ohio), a
17 TCPA class settlement of \$6,000,000, granted final approval on May 22, 2019.
- 18 e. *Fowler, et al. v. Wells Fargo Bank, N.A.*, filed on behalf of consumers who
19 were overcharged fees on FHA mortgages. The case settled on a class-wide
20 basis in for \$30,000,000 in 2018, and final approval was granted in January
21 2019.
- 22 f. *Booth, et al. v. AppStack, et al.*, No. 2:13-cv-01533 (W.D. Wash), a TCPA
23 settlement in 2016, granted final approval on January 11, 2017.
- 24 g. *Goetz v. Benefit Recovery Specialists, Inc.* (Wis. Cir. Ct., Walworth Cty.), a
25 data breach case that resulted in a nationwide class settlement where Turke &
26 Strauss was preliminarily approved as class counsel. Final approval is pending
27

1 in the Circuit Court of Walworth County, Wisconsin.

2 4. Turke & Strauss's experience in these cases has provided it with expertise in the
3 legal, factual, management, settlement, notice, and administration issues that characterize class
4 actions like these related to consumer privacy.

5 5. Attached here to as **Exhibit A** is a copy of the Turke & Strauss LLP Firm Resume.

6 6. In this case, Turke & Strauss has vigorously protected the interests of the members
7 of the proposed Class alongside our co-counsel.

8 7. Turke & Strauss has taken the lead on discovery from Defendants and has assisted
9 in drafting and/or revising a number of pleadings and motions filed in this case. Turke & Strauss
10 intends to maintain an active role in the litigation of this matter.

11
12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing information is true and correct, based on my knowledge, information, and belief.

14
15 Executed on December 6, 2022 at Eagan, Minnesota.

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17
18 /s/ Raina C. Borrelli
Raina C. Borrelli